

7. To the extent Paragraph 7 contains any allegations, Plaintiff denies them.

8. Plaintiff admits that there is an actual controversy based on Plaintiff's filing of this action.  
Plaintiff denies the remaining allegations of Paragraph 8.

9. Denied.

10. Denied.

## **COUNT II – DECLARATION REGARDING (ALLEGED) INVALIDITY**

11. To the extent Paragraph 11 contains any allegations, Plaintiff denies them.

12. Plaintiff admits that there is an actual controversy based on Plaintiff's filing of this action.  
Plaintiff denies the remaining allegations of Paragraph 12.

13. Denied.

14. Denied.

## **RESPONSE TO PRAYER FOR RELIEF**

Plaintiff denies that Defendant is entitled to any of the relief sought in its prayer.

Respectfully Submitted,

Dated: June 4, 2020

*/s/ Papool S. Chaudhari*  
By: \_\_\_\_\_  
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**ATTORNEYS FOR PLAINTIFF  
ECREDIT SOLUTIONS, LLC**

**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule. As such, the foregoing was served on all counsel of record who have consented to electronic service. Pursuant to Fed. R. Civ. P. 5(d) and local rule, all others not deemed to have consented to electronic service will be served with a true and correct copy of the foregoing via email on this 4th day of June, 2020.

*/s/ Papool S. Chaudhari*

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**Papool S. Chaudhari**